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10 Attorneys for Defendant  
11 COSTCO WHOLESALE CORPORATION

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14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA

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18 ZOILA SIERRA, an individual,  
19 Plaintiff,  
20 vs.  
21 COSTCO WHOLESALE CORPORATION, a  
22 Washington Corporation; EDDIE, an  
23 individual; and DOES 1-25, inclusive,  
24 Defendants.

Case No.  
[Alameda County Superior Court Case No.  
RG21106297]  
**DEFENDANT COSTCO WHOLESALE  
CORPORATION'S REQUEST FOR  
JUDICIAL NOTICE [FRE 201]**  
Action Filed: July 23, 2021  
Trial Date: N/A

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**PLEASE TAKE NOTICE** that in support of its Notice of Removal, pursuant to the  
Federal Rules of Evidence rule 201, Defendant COSTCO WHOLESALE CORPORATION  
("Costco") requests this Court take judicial notice of the following:

1. A true and correct copy of Plaintiff ZOILA SIERRA's ("Plaintiff") Summons and  
Complaint filed on July 23, 2021, in the Alameda County Superior Court, Case No. RG21106297,  
and served on Costco on February 3, 2022, is attached to this Request for Judicial Notice as

**Exhibit A.**

2. Plaintiff is a resident of Alameda County, California, as alleged in the operative  
Complaint.

3. A true and correct copy of Plaintiff's Statement of Damages served by Plaintiff on  
February 3, 2022 is attached to this Request for Judicial Notice as **Exhibit B.**

1       4.     A true and correct copy of Costco's Answer contemporaneously filed in Case No.  
 2 RG21106297 of the Alameda County Superior Court is attached to this Request for Judicial  
 3 Notice as **Exhibit C**.

4       5.     Costco is a corporation formed and organized under the laws of the State of  
 5 Washington, as evidenced by the Amended Statement of Designation by a Foreign Corporation, a  
 6 true and correct copy of which is attached to this Request for Judicial Notice as **Exhibit D**, and  
 7 which is found on the California Secretary of State Website.

8       6.     Costco Wholesale Corporation's principal place of business is located at 999 Lake  
 9 Drive, Issaquah, Washington 98027, as evidenced by the Statement of Information filed by Costco  
 10 on June 27, 2019 with the California Secretary of State, a copy of which is attached to this  
 11 Request for Judicial Notice as **Exhibit E**, and which is found on the California Secretary of State  
 12 Website.

13       **A.     LEGAL AUTHORITY FOR TAKING JUDICIAL NOTICE OF THIS**  
 14       **MATERIAL**

15       This Court may take judicial notice at any stage of the proceeding. Fed R. Evid. 201(d).  
 16 Paragraph (b)(2) of Rule 201 states in part that “[t]he court may judicially notice a fact that is not  
 17 subject to reasonable dispute because it: ... can be accurately and readily determined from  
 18 sources whose accuracy cannot reasonably be questioned.” Exhibits A, B, C, D, and E are public  
 19 records maintained by the State of California and readily accessible through the California  
 20 Secretary of state website, and the Alameda County Superior Court Online Docket. The  
 21 aforementioned facts are maintained by reliable sources and cannot reasonably be questioned.

22       In light of the foregoing, Costco requests this Court take judicial notice of the following  
 23 facts: (1) Plaintiff filed a Complaint with the San Mateo County Superior Court against Costco  
 24 March 22, 2021 alleging causes of action for negligence and premises liability; (2) Plaintiff is a  
 25 resident of the State of California; (3) Plaintiff served Costco with the Complaint and Statement of  
 26 Damages on February 3, 2022; (4) Costco contemporaneously filed an Answer to Plaintiffs'  
 27 Complaint in Case No. RG21106297 of the Alameda County Superior Court, with this Notice of  
 28 Removal and supporting documents, generally denying Plaintiffs' claims and asserting various

1 affirmative defenses; (5) Costco is a corporation duly incorporated in the State of Washington; and  
2 (6) Costco's principal place of business is located in the State of Washington.

3 **B. CONCLUSION**

4 For all of the aforementioned reasons, Defendant Costco respectfully requests that this  
5 Court take judicial notice of the records and facts set forth above.

6 DATED: March 7, 2022

SEVERSON & WERSON  
A Professional Corporation

7 By: \_\_\_\_\_  
8

  
9 SHARON C. COLLIER

10 Attorneys for Defendant COSTCO WHOLESALE  
11 CORPORATION

# EXHIBIT A

EXHIBIT A



CT Corporation

**Service of Process  
Transmittal**

02/03/2022

CT Log Number 540997524

**TO:** Laura Aznavoorian, Litigation Supervisor  
Gallagher Bassett Services, Inc.  
1901 S. Meyers Rd, Suite 200C  
Oakbrook Terrace, IL 60181

**RE: Process Served in California**

**FOR:** Costco Wholesale Corporation (Domestic State: WA)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Re: ZOILA SIERRA, an individual // To: Costco Wholesale Corporation

**DOCUMENT(S) SERVED:** --

**COURT/AGENCY:** None Specified  
Case # RG21106297

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, GLENDALE, CA

**DATE AND HOUR OF SERVICE:** By Process Server on 02/03/2022 at 01:57

**JURISDICTION SERVED :** California

**APPEARANCE OR ANSWER DUE:** None Specified

**ATTORNEY(S) / SENDER(S):** None Specified

**ACTION ITEMS:** CT has retained the current log, Retain Date: 02/03/2022, Expected Purge Date: 02/18/2022

Image SOP

Email Notification, Laura Aznavoorian laura\_aznavoorian@gbtpa.com

Email Notification, Zois Johnston zjohnston@costco.com

Email Notification, Maureen Papier maureen\_papier@gbtpa.com

**REGISTERED AGENT ADDRESS:** Amanda Garcia  
330 N BRAND BLVD  
STE 700  
GLENDALE, CA 91203  
866-665-5799  
SouthTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



## PROCESS SERVER DELIVERY DETAILS

**Date:** Thu, Feb 3, 2022

**Server Name:** Ramiro Saucedo

Entity Served	COSTCO WHOLESALE CORPORATION
Case Number	RG21106297
Jurisdiction	CA



SUM-100

## SUMMONS (CITACION JUDICIAL)

**NOTICE TO DEFENDANT: COSTCO WHOLESALE CORPORATION, a (AVISO AL DEMANDADO):** Washington Corporation; EDDIE, an individual; and DOES 1-25, inclusive.

**YOU ARE BEING SUED BY PLAINTIFF: ZOILA SIERRA, an individual. (LO ESTÁ DEMANDANDO EL DEMANDANTE):**

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

ENDORSED

FILED

ALAMEDA COUNTY

JUL 23 2021

CLERK OF THE SUPERIOR COURT  
By \_\_\_\_\_

AMRIT KHAN

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

**AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la Información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta carta y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es):  
Superior Court of California, County of Alameda

CASE NUMBER:  
(Número del Caso)

RG 211062

1225 Fallon Street

Oakland, California 94612

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: Zavosh Rashidi, Esq.  
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

DOWNTOWN LA LAW GROUP

601 N. Vermont Ave., Los Angeles, CA 90004

DATE: JUL 23 2021

Chad Finke (213) 389-3765  
Clerk, by \_\_\_\_\_ Deputy \_\_\_\_\_  
(Secretario) \_\_\_\_\_ Adjunto \_\_\_\_\_ (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)

NOTICE TO THE PERSON SERVED: You are served

1.  as an individual defendant.
2.  as the person sued under the fictitious name of (specify):  
*COSTCO Wholesale Corporation, a Washington Corporation*
3.  on behalf of (specify):  
under:  CCP 416.10 (corporation)  CCP 416.60 (minor)  
 CCP 416.20 (defunct corporation)  CCP 416.70 (conservatee)  
 CCP 416.40 (association or partnership)  CCP 416.90 (authorized person),  
 other (specify):
4.  by personal delivery on (date):

1 Zavosh Rashidi, Esq. - State Bar No. 328399  
2 DOWNTOWN L.A. LAW GROUP  
3 601 N. Vermont Ave.  
4 Los Angeles, CA 90004  
5 Tel: (213) 389-3765  
6 Fax: (877) 389-2775  
7 Email: Zavosh@downtownlalaw.com

ENDORSED  
FILED  
ALAMEDA COUNTY

JUL 23 2021

CLERK OF THE SUPERIOR COURT  
BY AMRIT KHAN

6 Attorneys for Plaintiff  
7 ZOILA SIERRA

8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF ALAMEDA

10  
11 ZOILA SIERRA, an individual.

Case No.:

*RG 21106297*

12 Plaintiff,

13 v.  
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15 COSTCO WHOLESALE CORPORATION, a  
16 Washington Corporation; EDDIE, an  
17 individual; and DOES 1-25, inclusive.

18 Defendants.  
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21 COMES NOW, Plaintiff, ZOILA SIERRA, and alleges against Defendants, and each  
22 of them, as follows:

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COMPLAINT FOR DAMAGES

1. NEGLIGENCE  
2. PREMISES LIABILITY

[JURY DEMANDED]

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Plaintiff ZOILA SIERRA is an individual and is now, and at all times mentioned in  
this complaint was, an adult resident of Alameda County, California.  
Plaintiff is informed and believes, and based upon such information and belief alleges  
that at all times relevant hereto Defendants COSTCO WHOLESALE CORPORATION, a  
Washington Corporation; EDDIE, an individual; and DOES 1-25, inclusive, are, and at all  
times herein mentioned were individuals, corporations, sole proprietors, shareholders,

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Los Angeles, CA 90004

1 associations, partners and partnerships, joint venturers, and/or business entities unknown,  
2 primarily residing and doing business in the county of Alameda, State of California.

3 3. Plaintiff is informed and believes, and based upon such information alleges that  
4 Defendant EDDIE was a supervisor and/or manager of the store at the time of Plaintiff's slip  
5 and fall. Based on information and belief, EDDIE is now, and at all times mentioned in this  
6 complaint was, an adult resident of Alameda County, California. It is believed that EDDIE  
7 was responsible for the maintenance of the store at the time of Plaintiff's slip and fall, was  
8 responsible to verify that there was in place a policy which provided for the maintenance of  
9 the store according to industry standards, was responsible for the training and education of  
10 the store employees who were tasked with conducting the maintenance of the store, and was  
11 responsible for verifying that the store be maintained according to industry standards and  
12 sufficient policies and procedures.

13 4. Defendants DOES 1-25, inclusive, are sued herein under fictitious names, their true  
14 names and capacities being unknown to Plaintiff. Plaintiff will amend this complaint to  
15 allege their true names and capacities when ascertained. Plaintiff is informed and believes  
16 and thereon alleges that each of the fictitiously named Defendants is responsible in some  
17 manner for the occurrences herein alleged, and that Plaintiff's damages as herein alleged were  
18 proximately caused by those Defendants.

19 5. Plaintiff is informed and believes, and based upon such information and belief alleges  
20 that at all times relevant hereto Defendants COSTCO WHOLESALE CORPORATION, a

21 Washington Corporation; EDDIE, an individual; and DOES 1-25, inclusive, are, and at all  
22 times herein mentioned where individuals, corporations, sole proprietors, shareholders,  
23 associations, partners and partnerships, joint venturers, and/or business entities unknown,  
24 primarily residing and doing business in the County of Alameda, State of California. At all  
25 times herein mentioned, said Defendants were the owners, lessors, sub-lessors, managing  
26 agents, landlords, renters, managers, operators, marketers, inspectors, maintainers and  
27 controllers, of a commercial property located at 22330 Hathaway Ave. Hayward Ca 94541,

1 (hereinafter referred to as "THE SUBJECT PREMISES"), to which building the general  
2 public is invited to come.

3 6. At all times herein mentioned, each of the Defendants were the agents, servants, and  
4 employees of their co-defendants, and in doing the things hereinafter alleged were acting in  
5 the scope of their authority as agents, servants, and employees, and with permission and  
6 consent of their co-defendants. Plaintiff is further informed and believes, and thereon  
7 alleges, that each of the Defendants herein gave consent to, ratified, and authorized the acts  
8 alleged herein to each of the remaining Defendants.

9 **FIRST CAUSE OF ACTION**

10 **NEGLIGENCE**

11 **(Against All Defendants)**

12 7. Plaintiff re-alleges each and every allegation contained in the above Paragraphs 1  
13 through 6, and by this reference incorporates said paragraphs as though fully set forth herein.

14 8. On July 23, 2019 Plaintiff was lawfully on the premises of Defendants' store for the  
15 purpose of purchasing miscellaneous items. Plaintiff was walking within the subject premises  
16 when, suddenly and without warning, Plaintiff slipped on water and/or similar substance on  
17 the floor and fell violently to the floor, causing Plaintiff to sustain the serious injuries and  
18 damages described below.

19 9. Said Defendants, and each of them, fully and well knew, or should have known in the  
20 exercise of reasonable care, that the structures and/or components and/or other parts of said  
21 building were in a dangerous and defective and unsafe condition, and a menace to Plaintiff  
22 and others lawfully on said premises.

23 10. By reason of the aforesaid negligence, carelessness and recklessness of Defendants,  
24 and each of them, as aforesaid, and as a direct and proximate result thereof, a dangerously  
25 dirty and/or wet floor that was not properly installed, maintained, cleaned and/or protected at  
26 said property causing Plaintiff to sustain the injuries and damages as hereinafter alleged.

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1 11. As a direct and proximate result of the negligence, carelessness and recklessness of  
2 Defendants, and each of them, as aforesaid, Plaintiff was hurt in her health, strength and  
3 activity, sustaining severe shock and injuries to her person, all of which said injuries have  
4 caused, continue to cause, and will in the future cause Plaintiff great physical and emotional  
5 pain and suffering; Plaintiff is informed and believes, and therefore alleges, that said injuries  
6 are permanent in nature, all to her damage in a sum according to proof.

7 12. As a direct and proximate result of the negligence, carelessness and recklessness of  
8 Defendants and each of them, as aforesaid, Plaintiff has been required to obtain medical  
9 services, and Plaintiff has suffered severe emotional distress.

10 **SECOND CAUSE OF ACTION**

11 **PREMISES LIABILITY**

12 **(Against All Defendants)**

13 13. Plaintiff re-alleges each and every allegation contained in the above Paragraphs 1  
14 through 12, and by this reference incorporates said paragraphs as though fully set forth  
15 herein.

16 14. On July 23, 2019 Plaintiff was lawfully on the premises of Defendants' store for the  
17 purpose of purchasing miscellaneous items. Plaintiff was walking within the subject premises  
18 when, suddenly and without warning, Plaintiff slipped on water and/or similar substance on  
19 the floor and fell violently to the floor, causing Plaintiff to sustain the serious injuries and  
20 damages described below.

21 15. On or about July 23, 2019, Defendants COSTCO WHOLESALE CORPORATION, a  
22 Washington Corporation; EDDIE, an individual; and DOES 1-25, inclusive, carelessly and  
23 negligently owned, rented, managed, leased, supervised, inspected, operated, maintained  
24 and/or controlled the premises located at or near 22330 Hathaway Ave. Hayward Ca 94541,  
25 such that it was in a dangerous, defective and unsafe condition in conscious disregard for the  
26 risk of harm to invitees thereon. By reason of said carelessness, negligence and conscious

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1 disregard of the Defendants, and each of them, said premises were unsafe and dangerous to  
2 the general public and specifically Plaintiff, ZOILA SIERRA.

3 16. Defendants COSTCO WHOLESALE CORPORATION, a Washington Corporation;  
4 EDDIE, an individual; and DOES 1-25, inclusive, and each of them, failed to warn Plaintiff  
5 of said dangerous, defective and unsafe condition; although said Defendants, and each of  
6 them, knew of said condition.

7 17. As a direct and legal result of said carelessness, negligence and conscious disregard  
8 of Defendants COSTCO WHOLESALE CORPORATION, a Washington Corporation;  
9 EDDIE, an individual; and DOES 1-25, inclusive, and each of them, Plaintiff was seriously  
10 injured when she slipped and fell on a dangerously dirty and/or wet floor that was not  
11 properly installed, maintained, cleaned and/or protected at said property causing Plaintiff to  
12 sustain the injuries and damages as hereinafter alleged.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Plaintiff demands judgment against Defendants as follows:

15 1. For general damages in a sum according to proof;  
16 2. For medical, hospital, and related expenses according to proof;  
17 3. For loss of earnings according to proof;  
18 4. For loss of future earning capacity according to proof;  
19 5. For costs of suit herein incurred;  
20 6. For such other and further relief as this Court may deem proper.

22 DATED: July 23, 2021

23 DOWNTOWN L.A. LAW GROUP

24  
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26 BY: Zavosh Rashidi, Esq.  
27 Attorney for Plaintiff,  
28 ZOILA SIERRA

///

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601 N Vermont Ave.  
Los Angeles, CA 90004

1 **DEMAND FOR JURY TRIAL**

2 Plaintiff demands trial by jury of all issues so triable.

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4 DATED: July 23, 2021

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DOWNTOWN L.A. LAW GROUP

BY: Zavosh Rashidi, Esq.  
Attorney for Plaintiff,  
ZOILA SIERRA

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601 N. Vermont Ave.  
Los Angeles, CA 90004

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Zavosh Rashidi, Esq. SBN: 328399 DOWNTOWN LA LAW GROUP 601 N. Vermont Ave., Los Angeles, CA 90004 TELEPHONE NO.: (213) 389-3765 FAX NO.: (877) 389-2775 ATTORNEY FOR PLAINTIFF: ZOILA SIERRA		FOR COURT USE ONLY FILED ALAMEDA COUNTY JUL 2 2021 CLERK'S OFFICE COURT OF APPEALS ATTORNEY KHALIL
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA STREET ADDRESS: 1225 Fallon Street MAILING ADDRESS: 1225 Fallon Street CITY AND ZIP CODE: Oakland, CA 94612 BRANCH NAME: <u>Reps. C. Davidson Alameda County Courthouse</u>		CASE NUMBER: <u>CG 21106297</u> JUDGE: _____ DEPT: _____
CASE NAME: ZOILA SIERRA vs. COSTCO WHOLESALE CORPORATION, et. al.		
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> Unlimited <input type="checkbox"/> Limited (Amount demanded exceeds \$25,000) <input type="checkbox"/> (Amount demanded is \$25,000 or less)		<b>Complex Case Designation</b> <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
Items 1-6 below must be completed (see instructions on page 2).		
1. Check one box below for the case type that best describes this case:		
Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input checked="" type="checkbox"/> Other PI/PD/WD (23)	Real Property <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20)
Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35)	Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- Large number of separately represented parties
- Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
- Substantial amount of documentary evidence
- Large number of witnesses
- Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive

4. Number of causes of action (specify): Two

5. This case  is  is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: 7/23/21

Zavosh Rashidi, Esq.

(TYPE OR PRINT NAME)

SIGNATURE OF PARTY OR ATTORNEY FOR PARTY

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code) (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

## INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages; (2) punitive damages; (3) recovery of real property; (4) recovery of personal property; or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

## Auto Tort

## Auto (22)–Personal Injury/Property

- Damage/Wrongful Death
- Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

## Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
- Asbestos Property Damage
- Asbestos Personal Injury/ Wrongful Death
- Product Liability (*not asbestos or toxic/environmental*) (24)
- Medical Malpractice (45)
- Medical Malpractice– Physicians & Surgeons
- Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
- Premises Liability (e.g., slip and fall)
- Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
- Intentional Infliction of Emotional Distress
- Negligent Infliction of Emotional Distress
- Other PI/PD/WD

## Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
- Legal Malpractice
- Other Professional Malpractice (*not medical or legal*)

## Other Non-PI/PD/WD Tort (35)

- Employment
- Wrongful Termination (36)
- Other Employment (15)

## CASE TYPES AND EXAMPLES

## Contract

- Breach of Contract/Warranty (06)
- Breach of Rental/Lease
  - Contract (*not unlawful detainer or wrongful eviction*)
- Contract/Warranty Breach–Seller Plaintiff (*not fraud or negligence*)
- Negligent Breach of Contract/ Warranty
- Other Breach of Contract/Warranty Collections (e.g., money owed, open book accounts) (09)
- Collection Case–Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage (*not provisionally complex*) (18)
- Auto Subrogation
- Other Coverage
- Other Contract (37)
- Contractual Fraud
- Other Contract Dispute

## Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
- Writ of Possession of Real Property
- Mortgage Foreclosure
- Quiet Title
- Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

## Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

## Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
- Writ–Administrative Mandamus
- Writ–Mandamus on Limited Court

## Case Matter

- Writ–Other Limited Court Case Review
- Other Judicial Review (39)
- Review of Health Officer Order
- Notice of Appeal–Labor Commissioner Appeals

## Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)
- Enforcement of Judgment
- Enforcement of Judgment (20)
- Abstract of Judgment (Out of County)
- Confession of Judgment (*non-domestic relations*)
- Sister State Judgment
- Administrative Agency Award (*not unpaid taxes*)
- Petition/Certification of Entry of Judgment on Unpaid Taxes
- Other Enforcement of Judgment Case

## Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint (*not specified above*) (42)
- Declaratory Relief Only
- Injunctive Relief Only (*non-harassment*)
- Mechanics Lien
- Other Commercial Complaint Case (*non-tort/non-complex*)
- Other Civil Complaint (*non-tort/non-complex*)

## Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition (*not specified above*) (43)
- Civil Harassment
- Workplace Violence
- Elder/Dependent Adult Abuse
- Election Contest
- Petition for Name Change
- Petition for Relief From Late Claim
- Other Civil Petition



**Superior Court of California**  
*County of Alameda*

Superior Court of California, County of Alameda  
Hayward Hall of Justice  
24405 Amador Street  
Hayward, CA 94544

Receipt Nbr: 806981  
Clerk: akhan  
Date: 07/23/2021

Type	(Case Number)	Description	Amount
Filing	RG21106297	Complaint - Other PI/PD/WD Tort	\$435.00

Total Amount Due: \$435.00  
Prior Payment:  
Current Payment: \$435.00  
Balance Due: \$0.00  
Overage:  
Excess Fee:  
Change:

Payment Method:  
Cash:  
Check: \$435.00

# **EXHIBIT B**

**EXHIBIT B**

1 Daniel Azizi, Esq., SBN 268995  
2 Zavosh Rashidi, Esq.; SBN 328399  
2 **DOWNTOWN L.A. LAW GROUP**  
3 601 N Vermont Ave  
4 Los Angeles, CA 90004  
4 Tel.: (213) 389-3765  
5 Fax: (877) 389-2775  
5 Email: [Zavosh@downtownlalaw.com](mailto:Zavosh@downtownlalaw.com)

6 Attorneys for Plaintiff  
7 ZOILA SIERRA

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF ALAMEDA**

10 ZOILA SIERRA, an individual.

10 Case No.: RG21106297

11 Plaintiff,

11 **STATEMENT OF DAMAGES**

12 v.

13 COSTCO WHOLESALE CORPORATION, a  
14 Washington Corporation; EDDIE, an  
15 individual; and DOES 1-25, inclusive.

16 Defendants.

17 Plaintiff, ZOILA SIERRA, hereby provides to Defendants the following Statement of

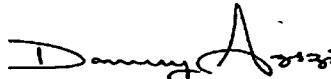
18 Damages:

19 1. General Damages: In excess of \$1,000,000.00  
20 2. Special Damages: In excess of \$1,000,000.00

21 Plaintiff reserves the right to amend this Statement of Damages at a later time, as  
22 Discovery develops.

23 DATED: January 31, 2022

23 **DOWNTOWN L.A. LAW GROUP**

24 

25  
26 Daniel Azizi, Esq.  
27 Zavosh Rashidi, Esq.  
28 Attorneys for Plaintiff,  
ZOILA SIERRA

# EXHIBIT C

# EXHIBIT C

1 SHARON C. COLLIER (State Bar No. 203450)  
2 scc@severson.com  
3 SEVERSON & WERSON  
4 A Professional Corporation  
5 One Embarcadero Center, Suite 2600  
6 San Francisco, California 94111  
7 Telephone: (415) 398-3344  
8 Facsimile: (415) 956-0439  
9  
10 Attorneys for Defendant  
11 COSTCO WHOLESALE CORPORATION

12

13

SUPERIOR COURT OF CALIFORNIA

14

COUNTY OF ALAMEDA — RENE C. DAVIDSON COURTHOUSE

15

ZOILA SIERRA, an individual, Case No. RG21106297

16

Plaintiff,

17

vs.

18

COSTCO WHOLESALE CORPORATION, a Washington Corporation; EDDIE, an individual; and DOES 1-25, inclusive,

19

Defendants.

**COSTCO WHOLESALE  
CORPORATION'S ANSWER TO  
UNVERIFIED COMPLAINT**

Action Filed: July 23, 2021

20

21 COMES NOW, Defendant Costco Wholesale Corporation, and, in answer to the unverified  
22 Complaint of Plaintiff Zoila Sierra, denies each and every, all and singular, generally and  
23 specifically, the allegations therein contained and further denies that said Plaintiff has been  
24 damaged in any sum, or sums, if any at all.

25

**FIRST AFFIRMATIVE DEFENSE**

26

*(Failure to State a Cause of Action)*

27

The Complaint, and each cause of action thereof, fails to set forth facts sufficient to  
28 constitute a cause of action against this answering Defendant.

29

**SECOND AFFIRMATIVE DEFENSE**

30

*(Comparative Fault)*

31

32 Defendant alleges that Plaintiff was careless and negligent in and about the matter alleged  
33 in her Complaint and that said carelessness and negligence on said Plaintiff's own part

1 proximately contributed to the happening of the accident, to the injuries, losses and damages  
2 complained of, if any there were.

3 **THIRD AFFIRMATIVE DEFENSE**

4 ***(Fault of Others)***

5 While at all times denying any liability and responsibility whatsoever to Plaintiff herein,  
6 Defendant contends that the alleged liability or responsibility is small in proportion to the alleged  
7 liability and responsibility of other persons and entities, including other persons and entities who  
8 may or may not be defendants herein, and that Plaintiff should be limited to seeking recovery from  
9 these defendants for the proportion of alleged injuries and damages for which these defendants are  
10 allegedly liable or responsible, all such alleged liability and responsibility being expressly denied.

11 **FOURTH AFFIRMATIVE DEFENSE**

12 ***(Assumption of the Risk)***

13 Plaintiff is barred from asserting any claim against Defendant by reason of Plaintiff's  
14 assumption of the risk of the matters causing the injuries and damages incurred, if any.

15 **FIFTH AFFIRMATIVE DEFENSE**

16 ***(Failure to Use Reasonable Diligence)***

17 Defendant is informed and believes and thereon alleges that Plaintiff's injuries, losses or  
18 damages, if any, were aggravated by Plaintiff's and/or other defendants' failure to use reasonable  
19 diligence.

20 **SIXTH AFFIRMATIVE DEFENSE**

21 ***(Doctrine of Laches)***

22 Defendant alleges that the Plaintiff's claims are barred by the equitable doctrine of laches.

23 **SEVENTH AFFIRMATIVE DEFENSE**

24 ***(Waiver / Estoppel)***

25 Plaintiff has waived and is estopped from asserting any claim against this Defendant by  
26 reason of plaintiff's approval and consent to the risk in the matters causing the damages alleged, if  
27 any, in her acknowledgment of, acquiescence in and consent to the alleged act or omissions, if any, of  
28 this Defendant.

## **EIGHTH AFFIRMATIVE DEFENSE**

### ***(Failure to Mitigate Damages)***

Defendant alleges that Plaintiff's injuries, losses and damages suffered, if any, which are expressly denied, were caused by Plaintiff's failure to take reasonable steps to mitigate such damages; to the extent that such injuries, losses or damages were caused by Plaintiff's failure to take reasonable steps to mitigate such damages, that such are not recoverable against this answering Defendant.

## **EIGHTH AFFIRMATIVE DEFENSE**

***(Civil Code §1431.2 Apportionment)***

The liability of this answering Defendant, if any, for Plaintiff's economic loss should be prorated pursuant to the provisions of California Civil Code section 1431.2.

12 WHEREFORE, Defendant prays for judgment as follows:

13       1.     That judgment be entered into the within action in favor of Defendant and against

14 Plaintiff upon the issues of the Complaint;

15       2.     That the Complaint herein be dismissed in its entirety;

16       3.     For costs of suit; and

17       4.     For such other and further relief as the court may deem just and proper.

18 | DATED: March 7, 2022

SEVERSON & WERSON  
A Professional Corporation

By:

Sharon  
SHARON C. COLLIER

Attorneys for Defendant COSTCO WHOLESALE CORPORATION

1 **PROOF OF SERVICE**

2 **Zoila Sierra v. Costco Wholesale Corp.,**  
3 **Alameda County Superior Court Case No.: RG21106297**

4 At the time of service, I was over 18 years of age and not a party to this action. I am  
5 employed in the County of San Francisco, State of California. My business address is One  
6 Embarcadero Center, Suite 2600, San Francisco, CA 94111.

7 On March 7, 2022, I served true copies of the following document(s):

8 **COSTCO WHOLESALE CORPORATION'S ANSWER TO UNVERIFIED  
9 COMPLAINT**

10 on the interested parties in this action as follows:

11 Zavosh Rashidi, Esq. *Attorney for Plaintiff Zoila Sierra*  
12 Downtown L.A. Law Group  
13 601 N. Vermont Avenue  
14 Los Angeles, CA 90004

15 Tele: (213) 389-3765  
16 Fax: (877) 389-2775

17 E-mail:[Zavosh@downtownlalaw.com](mailto:Zavosh@downtownlalaw.com)

18 **BY ELECTRONIC SERVICE:** I electronically filed the document(s) with the Clerk of  
19 the Court by using the First Legal system. Participants in the case who are registered users will be  
20 served by the First Legal system. Participants in the case who are not registered users will be  
21 served by mail or by other means permitted by the court rules.

22 I declare under penalty of perjury under the laws of the State of California that the  
23 foregoing is true and correct.

24 Executed on March 7, 2022, at San Francisco, California.

25 

---

26 */s/ Katrina D. Adkins*  
27 Katrina D. Adkins  
28

# EXHIBIT D

# EXHIBIT D

NOTE:

A344517

1587907

DO NOT WRITE IN THIS SPACE

FILED

In the office of the Secretary of State  
of the State of California

JAN 22 1988

*March Fong Eu*  
MARCH FONG EU, Secretary of State

COSTCO WHOLESALE CORPORATION

, a corporation  
organized and existing under the laws of Washington,  
and which is presently qualified for the transaction of intrastate business in the  
State of California, makes the following statements and/or designation:

That the name of the corporation has been changed to that hereinabove set forth  
and that the name relinquished at the time of such change was \_\_\_\_\_  
CWC Corporation which will do business in California as Washington  
Wholesalers Inc.

COSTCO WHOLESALE CORPORATION

(Name of Corporation)

*Michael D. Anderton*  
(Signature of corporate officer)

Corporate

Michael D. Anderton, Secretary

(Typed name and title of officer signing)

INSTRUCTIONS:

1. If this Amended Statement shows a change of corporate name, there must be attached to this Amended Statement a certificate of an authorized public official of the state or place of incorporation, that such change of name was made in accordance with the laws of that state or place.
2. For filing this Amended Statement there is a fee of \$15.00.



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**STATE of WASHINGTON    SECRETARY of STATE**

---

I, Ralph Munro, Secretary of State of the State of Washington and custodian of its seal, hereby certify that according to the records on file in my office Articles of Merger between CWC CORPORATION, a Washington corporation, and COSTCO WHOLESALE CORPORATION, a Delaware corporation, whereby CWC CORPORATION is the surviving corporation under the name COSTCO WHOLESALE CORPORATION were received and filed in this office September 1, 1987.

Date: September 1, 1987  
Given under my hand and the seal of the State of Washington, at Olympia, the State Capitol.

A handwritten signature in black ink, appearing to read "Ralph Munro".

Ralph Munro, Secretary of State

# EXHIBIT E

EXHIBIT E

 <p><b>State of California</b> <b>Secretary of State</b></p> <p><b>Statement of Information</b> (Foreign Corporation)</p> <p><b>FEES (Filing and Disclosure): \$25.00.</b> If this is an amendment, see instructions.</p> <p><b>IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM</b></p>		F															
<p><b>G752821</b> <b>FILED</b></p> <p>In the office of the Secretary of State of the State of California</p> <p style="text-align: right;">JUN-27 2019</p>																	
<p>1. CORPORATE NAME COSTCO WHOLESALE CORPORATION</p>		This Space for Filing Use Only															
<p>2. CALIFORNIA CORPORATE NUMBER C1587907</p>																	
<p><b>No Change Statement</b> (Not applicable if agent address of record is a P.O. Box address. See instructions.)</p> <p>3. If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.  <input type="checkbox"/> If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to Item 13.</p>																	
<p><b>Complete Addresses for the Following</b> (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE 999 LAKE DRIVE, ISSAQAH, WA 98027</td> <td style="width: 15%;">CITY</td> <td style="width: 15%;">STATE</td> <td style="width: 15%;">ZIP CODE</td> </tr> <tr> <td>5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY 4649 MORENA BOULEVARD, SAN DIEGO, CA 92117</td> <td>CITY</td> <td>STATE</td> <td>ZIP CODE</td> </tr> <tr> <td>6. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 4 LICENSING P.O. BOX 35005, SEATTLE, WA 98124</td> <td>CITY</td> <td>STATE</td> <td>ZIP CODE</td> </tr> </table>			4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE 999 LAKE DRIVE, ISSAQAH, WA 98027	CITY	STATE	ZIP CODE	5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY 4649 MORENA BOULEVARD, SAN DIEGO, CA 92117	CITY	STATE	ZIP CODE	6. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 4 LICENSING P.O. BOX 35005, SEATTLE, WA 98124	CITY	STATE	ZIP CODE			
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6. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 4 LICENSING P.O. BOX 35005, SEATTLE, WA 98124	CITY	STATE	ZIP CODE														
<p><b>Names and Complete Addresses of the Following Officers</b> (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;">7. CHIEF EXECUTIVE OFFICER/ WALTER C. JELINEK</td> <td style="width: 33%;">ADDRESS 999 LAKE DRIVE, ISSAQAH, WA 98027</td> <td style="width: 33%;">CITY</td> <td style="width: 33%;">STATE</td> <td style="width: 33%;">ZIP CODE</td> </tr> <tr> <td>8. SECRETARY JOHN C. SULLIVAN</td> <td>ADDRESS 999 LAKE DRIVE, ISSAQAH, WA 98027</td> <td>CITY</td> <td>STATE</td> <td>ZIP CODE</td> </tr> <tr> <td>9. CHIEF FINANCIAL OFFICER/ RICHARD A. GALANTI</td> <td>ADDRESS 999 LAKE DRIVE, ISSAQAH, WA 98027</td> <td>CITY</td> <td>STATE</td> <td>ZIP CODE</td> </tr> </table>			7. CHIEF EXECUTIVE OFFICER/ WALTER C. JELINEK	ADDRESS 999 LAKE DRIVE, ISSAQAH, WA 98027	CITY	STATE	ZIP CODE	8. SECRETARY JOHN C. SULLIVAN	ADDRESS 999 LAKE DRIVE, ISSAQAH, WA 98027	CITY	STATE	ZIP CODE	9. CHIEF FINANCIAL OFFICER/ RICHARD A. GALANTI	ADDRESS 999 LAKE DRIVE, ISSAQAH, WA 98027	CITY	STATE	ZIP CODE
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9. CHIEF FINANCIAL OFFICER/ RICHARD A. GALANTI	ADDRESS 999 LAKE DRIVE, ISSAQAH, WA 98027	CITY	STATE	ZIP CODE													
<p><b>Agent for Service of Process</b> If the agent is an individual, the agent must reside in California and Item 11 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 11 must be left blank.</p>																	
<p>10. NAME OF AGENT FOR SERVICE OF PROCESS C T CORPORATION SYSTEM</p>																	
<p>11. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY</p>																	
<p><b>Type of Business</b></p>																	
<p>12. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION WHOLESALE/RETAIL MBRSHP WAREHS</p>																	
<p>13. THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT.</p>																	
06/27/2019 DATE	GAIL E. TSUBOI TYPE/PRINT NAME OF PERSON COMPLETING FORM	AVP/ASST. SECRETARY TITLE															
		SIGNATURE															
SI-350 (REV 01/2013) APPROVED BY SECRETARY OF STATE																	